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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

CASE NO. 3:17-cv-00939

**WAYMO LLC'S STATEMENT OF NON-
OPPOSITION TO UBER'S
SUPPLEMENTAL MOTION TO MODIFY
INTERIM PROTECTIVE ORDER (DKT.
2734)**

Hearing:

Date: February 18, 2021

Time: 8:00 AM

Place: Courtroom 12, 19th Floor

Judge: Honorable William Alsup

1 Plaintiff Waymo LLC (“Waymo”) hereby submits a statement of non-opposition to Uber
2 Technologies, Inc.’s (“Uber”) Supplemental Motion to Modify the Interim Protective Order.

3 Uber previously moved for modification of the protective order entered in this case to
4 allow for Uber’s review and use of the confidential information produced in this litigation in a
5 separate bankruptcy proceeding. *See* Dkt. 2726. In its December 22, 2020 Order Modifying
6 Protective Order (“December 22 Order”), this Court granted Uber’s request to the extent that Uber
7 is permitted to “review our record for appropriate use in the bankruptcy proceeding” but must
8 provide “prior reasonable notice to all affected parties, including third parties, protected by our
9 protective order and an opportunity for them to be heard in the bankruptcy court” before
10 introducing or disclosing any protected material. Dkt. 2733 at 2. Given Uber’s assertion that
11 nonparties had been given notice of its request via ECF, the Court limited the December 22 Order
12 to evidence produced by third parties who had appeared on the ECF docket of this litigation. *Id.*
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15 Uber seeks to expand the application of the December 22 Order to the remaining third
16 parties who are not on the ECF Service List, but provided documents and/or testimony pursuant to
17 the protective order in this case (“Remaining Third Parties”). *See* Dkt. 2734. As Uber represents
18 it has now given notice to the Remaining Third Parties, Waymo does not oppose Uber’s
19 Supplemental Motion to Modify the Interim Protective Order. Consistent with the December 22
20 Order, Waymo reserves the right to object to Uber’s use of protected material in the bankruptcy
21 proceedings.
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1 DATED: January 20, 2021

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